

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TEDDY VOLKSWAGEN OF THE BRONX, LLC,

Docket #: 19-CV-02337-AJN-SN

Plaintiff,

-against-

PHILLIP DEMERSKY,


Defendant.

DEFENDANT'S MOTION IN LIMINE

Defendant, **PHILLIP DEMERSKY**, moves in limine to preclude the Plaintiff from offering the following statements, documents or factual references during the trial of the above-referenced matter.

1. Precluding Plaintiff from asserting Paramjit Kalra did not receive money from Drive Easy Program the same or similar to Defendant as Plaintiff refused to produce such relevant discovery despite demand of Paramjit Kalra receiving money with Drive Easy Program prior to January 2018; maintenance contracts for the 50 contracts claimed not to have been properly recorded.
2. Defendant reserves all rights to object to any document based on authentication, foundation, hearsay or any other appropriate objection.
3. Defendant will object to Plaintiff offering any expert testimony in this matter as no expert was identified nor any discovery relating thereto exchange.

Dated: May 21, 2021
Florida, New York



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TO:

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